

### REMARKS

Applicant respectfully requests further examination and reconsideration in view of the instant response. Claims 1-11 and 13-26 remain pending in the case. Claims 1-16 and 18-26 are rejected. Claim 17 is objected. Claims 1, 9, 13, 14, 17 and 21 are amended herein. No new matter has been added. Claim 12 is cancelled herein without prejudice.

### ALLOWABLE SUBJECT MATTER

Applicant wishes to thank the Examiner for the indication that Claim 17 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

### CLAIMS 24-26 – NO GROUND OF REJECTION GIVEN

“The examiner’s action will be complete as to all matters, except that in appropriate circumstances, such as misjoinder of invention, fundamental defects in the application, and the like, the action of the examiner may be limited to such matters before further action is made” (emphasis added; 37 CFR §1.104(b)). “In rejecting claims for want of novelty or for obviousness, the examiner must cite the best references at his or her command” (37 CFR §1.104(c)(2)).

The Office Action Summary of the instant Office Action states that Claims 1-16 and 18-26 are rejected. However, Applicant respectfully submits that nowhere in the Detailed Action is there an indication that Claims 24-26 are

rejected, nor is there any discussion of the rejection of Claims 24-26. Therefore, Applicants respectfully submit that the instant Office Action is not “complete as to all matters” as required under CFR 37 §1.104(b). Accordingly, Applicants respectfully submit that any subsequent Office Action, if necessary, should be non-Final as the rejections of Claims 24-26 have not yet been addressed.

### 35 U.S.C. §101

The Office Action mailed April 30, 2008, states that Claims 14-16, 18 and 20 are rejected under 35 U.S.C. §101 as it is asserted that “the claimed invention is directed to non-statutory subject matter” (instant Office Action; page 2, section 1).

Applicant respectfully requests that the rejection of Claims 14-16, 18 and 20 under 35 U.S.C. §101 fails to make a *prima facie* showing that “the claimed invention is directed to non-statutory subject matter.” Regarding Claims 14-16, 18 and 20, the instant Office Action states, “[e]ach of claimed 14-16, 18 and 20 recites the mere manipulation of data or an abstract idea, or merely solves a mathematical problem without a limitation to a practical application” (pages 3-4, section 1). Moreover, the instant Office Action recites “[e]ach of claims 14-16, 18 and 20 merely manipulates data without ever producing a useful, concrete and tangible result. Each of the instant claims results in a determination of responsiveness. A determination, in and of itself, is not a real-world result” (page 4, section 1).

The instant Office Action further recites “[i]f the result has a real world practical application/use, then the test has been satisfied. The claim need not include the uses to which the result is ultimately put, just the result itself” (emphasis added: page 4, section 1).

Regarding the above statements from the instant Office Action, Applicant respectfully submits that a produced “tangible result” as defined in the MPEP appears to be a tangible result “the process claim must set forth a practical application of the judicial exception to produce a real-world result” (MPEP 2106(IV)(C)(2)(2)(b)). Applicant respectfully submits that a determination, so long as it sets forth a practical application to produce a real-world result, may be a tangible result. Specifically, Applicant has reviewed related case law and the MPEP and does not understand a determination to be restricted as a tangible result.

For example, In *re State Street*, 149 F.3d 47 USPQ2d 1596, 1600-1601 (Fed. Cir. 1998), it was held that the transformation of data, representing discrete dollar amounts, by a machine through a series of mathematical calculations into a final share price, constitutes a practical application of a mathematical algorithm, formula, or calculation, because it produces “a useful, concrete and tangible result”--a final share price momentarily fixed for recording and reporting purposes

and even accepted and relied upon by regulatory authorities and in subsequent trades.

Furthermore, MPEP 2106(IV)(C)(2)(2)(b) clearly states that the tangible requirement does not necessarily mean that a claim must either be tied to a particular machine or apparatus or must operate to change articles or materials to a different state or thing.

In other words, Applicants respectfully submit that the present invention overcomes the tangible non-statutory subject matter requirements of 35 U.S.C. §101 when the invention produces a real-world result. That is, Applicant understands tangible result to refer to a result that is capable of being understood and evaluated, and therefore regarded as real.

For example, with reference to the instant specification, “[i]t should be understood that in video transcoding, coefficients modified after a deblocking operation are still subject to transcoding (e.g., re-quantization) that may render the deblocking modification ineffective. In particular, some coefficients may be responsive to a deblocking operation while other coefficients may be unresponsive to a deblocking operation” (page 8, lines 16-20).

For the above reasons, Applicant respectfully submits that independent Claim 14 produces the useful, concrete and tangible result of “determining

whether said first coefficient is responsive to a deblocking operation based on

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said quantization operation.” Moreover, the result is capable of being understood and evaluated, and therefore should be regarded as real.

Therefore, Applicant respectfully submits that the rejection of Claim 14 under 35 U.S.C. §101 is improper and should be withdrawn. Furthermore, since the rejection under 35 U.S.C. §101 of Claim 14 is improper and should be withdrawn, Applicant respectfully submits that the rejection under 35 U.S.C. §101 of Claims 15, 16, 18 and 20 which depend on Claim 14 is also improper and should be withdrawn.

Therefore, Applicant respectfully requests that Claims 14-16, 18 and 20 overcome the rejection under 35 U.S.C. §101, as the rejection fails to make a *prima facie* showing that the claimed invention is directed toward non-statutory subject matter.

35 U.S.C. §102(b) – Claims 14-16, 18 and 20

The Office Action mailed April 30, 2008, states that Claims 14-16, 18 and 20 are rejected under 35 U.S.C. §102(b) as being anticipated by “Selective Requantization for Transcoding of MPEG Compressed Video” by Sorial et al., hereinafter referred to as “Sorial.” Applicant has reviewed Sorial and respectfully submits that the claimed embodiments as recited in Claims 14-16, 18 and 20 are not anticipated by Sorial for at least the following rationale.

Applicant respectfully directs the Examiner to independent Claim 14 that recites that an embodiment of the present invention is directed to (emphasis added):

A method for determining responsiveness of a coefficient of a media stream, said method comprising:

receiving a plurality of first coefficients and a plurality of second coefficients associated with plurality of blocks of pixels of said media stream, a first quantization step size, a second quantization step size, and a quantization operation;

performing said quantization operation for a first coefficient of said plurality of first coefficients and a second coefficient of said plurality of second coefficients, said quantization operation based on said first quantization step size and said second quantization step size; and

determining whether said first coefficient is responsive to a deblocking operation based on said quantization operation.

Claims 15, 16, 18 and 20 that depend from independent Claim 14 also include these recitations.

As presented above, MPEP §2131 provides:

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). ... “The identical invention must be shown in as complete detail as is contained in the ... claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim.

Applicant respectfully requests that Sorial is very different from the claimed embodiments. Applicant understands Sorial to teach selective requantization for transcoding of MPEG compressed video. In particular,

Applicant respectfully requests that Sorial does not teach, describe or suggest “determining whether said first coefficient is responsive to a deblocking operation based on said quantization operation” (emphasis added) as claimed.

With reference to Figure 4(b), Sorial recites “if the finer quantizer’s cell overlap with two cells of a coarser quantizer, then cascading error is introduced by requantization if the reconstructed value after the first quantization and the original data value each fall into a different quantization cell in the coarser quantizer” (emphasis added; Section 3, paragraph 5). In contrast, the claimed embodiment recites “determining whether said first coefficient is responsive to a deblocking operation based on said quantization operation” (emphasis added) as claimed. Applicant respectfully requests that cascading error introduced by requantization does not teach, describe or suggest “determining whether said first coefficient is responsive to a deblocking operation based on said quantization operation” (emphasis added).

Applicant notes the Examiner’s Response of the Office Action mailed April 30, 2008, which appears to assert that “it is inherent in Sorial’s disclosure that the first coefficient is responsive (i.e. benefits from selective requantization (page 218, section 4, paragraph 1)) based on the quantization operation” (Office Action mailed April 30, 2008; page 5, lines 17-19). Applicant respectfully submits that Sorial does not disclose that benefitting from selective requantization is

equivalent to “determining whether said first coefficient is responsive to a  
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deblocking operation” as claimed. In particular, Applicant submits that Sorial is silent to a deblocking operation. Moreover, Applicant respectfully submits that the selective requantization of Sorial does not anticipate “determining whether said first coefficient is responsive to a deblocking operation based on said quantization operation” (emphasis added) as claimed.

As such, Applicant respectfully requests that Sorial does not show the identical invention “in as complete detail as is contained in the ... claim” (MPEP §2131) as required to support an anticipation rejection. Therefore, Applicant respectfully requests that Sorial does not anticipate “determining whether said first coefficient is responsive to a deblocking operation based on said quantization operation” (emphasis added) as claimed.

Applicant respectfully asserts that Sorial does not teach, disclose or suggest the claimed embodiments of the present invention as recited in independent Claim 14, that this claim overcomes the rejection under 35 U.S.C. § 102(b), and that this claim is thus in a condition for allowance. Applicant respectfully requests that Sorial also does not teach or suggest the additional claimed features of the present invention as recited in Claims 15, 16, 18 and 20 that depend from independent Claim 14. Therefore, Applicant respectfully requests that Claims 15, 16, 18 and 20 also overcome the rejection under 35 U.S.C. § 102(b), and are in a condition for allowance as being dependent on an allowable base claim.

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35 U.S.C. §103(a) – Claims 1-5 and 9-11

The Office Action mailed April 30, 2008, states that Claims 1-5 and 9-11 are rejected under 35 U.S.C. §102(a) as being unpatentable over U.S. Patent No. 6,208,688 by Seo et al., hereinafter referred to as “Seo,” in view of “Blocking Artifact Reduction in Frequency Domain” by Triantafyllidis et al., hereinafter referred to as “Triantafyllidis.” Applicant has reviewed Seo and Triantafyllidis and respectfully submits that the claimed embodiments as recited in Claims 1-5 and 9-11 are patentable over Seo in view of Triantafyllidis for at least the following rationale.

Applicant respectfully directs the Examiner to independent Claim 1 that recites that an embodiment of the present invention is directed to (emphasis added):

A method for deblocking and transcoding a media stream, said method comprising:  
receiving a coefficient associated with a block of pixels of said media stream;  
selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation; and  
performing quantization on said second coefficient to generate a transcoded coefficient.

Independent Claim 9 recites includes a similar embodiments. Claims 2-5 that depend from independent Claim 1 and Claims 10 and 11 that depend from independent Claim 9 also include these embodiments.

“As reiterated by the Supreme Court in *KSR*, the framework for the objective analysis for determining obviousness under 35 U.S.C. 103 is stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). Obviousness is a question of law based on underlying factual inquiries” including “[a]scertaining the differences between the claimed invention and the prior art” (MPEP 2141(II)). “In determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious” (emphasis in original; MPEP 2141.02(I)). Applicant notes that “[t]he prior art reference (or references when combined) need not teach or suggest all the claim limitations, however, Office personnel must explain why the difference(s) between the prior art and the claimed invention would have been obvious to one of ordinary skill in the art” (emphasis added; MPEP 2141(III)).

Applicant respectfully notes that “[a] prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention” (emphasis in original; MPEP 2141.02(VI); *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984)).

Applicant respectfully submits that Seo does not disclose “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation” as recited in independent Claim 1 and the similar embodiment of independent Claim 9. In particular, Applicant notes that the instant Office Action states that “Seo does not teach deblocking a coefficient associated with a block of pixels from a media stream” (Office Action mailed April 30, 2008; page 8, lines 4-5). Moreover, Applicants respectfully asserts that Seo does not disclose “wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation” as claimed. Applicant respectfully submits that Seo is silent to any such teaching.

Moreover, Applicant respectfully submits that Triantafyllidis does not overcome the shortcomings of Seo. Specifically, Applicant respectfully submits that Triantafyllidis also does not disclose “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation” as claimed (emphasis added).

Applicants understand Triantafyllidis to disclosing blocking artifact reduction in the frequency domains. In particular, Triantafyllidis recites that “[f]or each block, its DC and AC coefficients are recalculated for artifact reduction (emphasis added; Abstract; p. 269). Therefore, Applicant respectfully submits that does not disclose, teach or suggest “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation” as claimed (emphasis added). Moreover, by disclosing that “[f]or each block, its DC and AC coefficients are recalculated” (emphasis added; Abstract; p. 269), Applicant respectfully submits that Triantafyllidis teaches away from the claimed embodiment.

Applicant respectfully asserts that Seo in view of Triantafyllidis does not teach, disclose or suggest the claimed embodiments of the present invention as recited in independent Claims 1 and 9, that these claims overcome the rejection under 35 U.S.C. § 103(a), and that these claims are thus in a condition for allowance. Applicant respectfully requests that Seo in view of Triantafyllidis also does not teach or suggest the additional claimed features of the present invention as recited in Claims 2-5 that depend from independent Claim 1 and Claims 10 and 11 that depend from independent Claim 9. Therefore, Applicant respectfully requests that Claims 2-5, 10 and 11 also overcome the rejection under 35 U.S.C. § 103(a), and are in a condition for allowance as being dependent on an allowable base claim.

35 U.S.C. §103(a) – Claims 6 and 12

The instant Office Action states that Claims 6 and 12 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Seo in view Triantafyllidis, further in view of Sorial. Claim 12 is cancelled herein, therefore a discussion of the rejection of Claim 12 is moot at this time. Applicant notes that independent Claim 9 has been amended to recite a similar embodiment to cancelled Claim 12. Applicant has reviewed Seo, Triantafyllidis and Sorial and respectfully submits that the claimed embodiments as recited in Claims 6 and 9 are patentable over the combination of Seo, Triantafyllidis and Sorial for at least the following rationale.

Claim 6 is dependent on independent Claim 1. Hence, by demonstrating that independent Claim 1 is are patentable over Seo, Triantafyllidis and Sorial, it is also demonstrated that Seo, Triantafyllidis and Sorial do not show or suggest the embodiment of Claim 6.

As presented above, Applicant respectfully submits that Seo in view of Triantafyllidis does not disclose “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation” as recited in independent Claim 1 and the similar embodiment of independent Claim 9. In particular, Applicant notes

that the instant Office Action states that “Seo combined with Triantafyllidis does not teach the limitation wherein said performing said deblocking operation comprises: determining whether said first quantized coefficient is responsive ...” (Office Action mailed April 30, 2008; page 8, lines 15-17).

Moreover, Applicant respectfully submits that Sorial does not overcome the shortcomings of Seo and Triantafyllidis. Specifically, Applicant respectfully submits that Sorial also does not disclose “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation” as claimed (emphasis added).

First, as presented above, with reference to Figure 4(b), Sorial recites “if the finer quantizer’s cell overlap with two cells of a coarser quantizer, then cascading error is introduced by requantization if the reconstructed value after the first quantization and the original data value each fall into a different quantization cell in the coarser quantizer” (emphasis added; Section 3, paragraph 5). In contrast, the claimed embodiment recites “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation” (emphasis added) as claimed. Applicant respectfully requests that cascading

error introduced by requantization does not teach, describe or suggest “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation” (emphasis added).

Second, Applicant respectfully submits that Sorial does not disclose that benefitting from selective requantization is equivalent to “wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation” (emphasis added) as claimed. In particular, Applicant submits that Sorial is silent to a deblocking operation.

Third, Applicant respectfully submits that the selective requantization of Sorial does not disclose “wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation” (emphasis added) as claimed. In contrast, by disclosing that selective requantization is performed based on the ratio of different quantization step sizes ( $Q_1/Q_2$ ) (page 218; section 4), and that selective requantization is performed to avoid critical ratios of different quantization step sizes, Sorial teaches away from “selectively performing a deblocking operation on said coefficient” (emphasis added) as claimed. In particular, Applicant submits that selective requantization is not equivalent to “selectively performing a deblocking operation on said coefficient” (emphasis added) as claimed.

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Applicant respectfully asserts that the combination of Seo, Triantafyllidis and Sorial does not support a *prima facie* case of obviousness and does not teach, disclose or suggest the claimed embodiments of the present invention as recited in independent Claims 1 and 9, that these claims overcome the rejection under 35 U.S.C. § 103(a), and that these claims are thus in a condition for allowance. Therefore, Applicant respectfully requests that Claim 6 also overcomes the rejection under 35 U.S.C. § 103(a), and is in a condition for allowance as being dependent on an allowable base claim.

35 U.S.C. §103(a) – Claims 7 and 13

The instant Office Action states that Claims 7 and 13 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Seo in view of Triantafyllidis, further in view of Sorial, yet further in view of U.S. Patent No. 6,987,808 by Mine, hereinafter referred to as “Mine.” Applicant has reviewed Seo, Triantafyllidis, Sorial and Mine and respectfully submits that the claimed embodiments as recited in Claims 7 and 13 are patentable over the combination of Seo, Triantafyllidis, Sorial and Mine for at least the following rationale.

Claim 7 is dependent on Claim 1 and includes the recitations of Claim 1 and Claim 13 is dependent on Claim 9 and includes the recitations of Claim 9. Hence, by demonstrating that Se Seo, Triantafyllidis, Sorial and Mine do not show or suggest the limitations of Claims 1 and 9, it is also demonstrated that



Seo, Triantafyllidis, Sorial and Mine do not show or suggest the embodiments of Claims 7 and 13.

As presented above, Applicant respectfully requests that the combination of Seo, Triantafyllidis and Sorial does not teach, describe or suggest “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation.”

The Examiner is respectfully directed to the argument accompanying the discussion of the rejection of Claims 6 and 12 above to support this assertion; the argument is not duplicated here for purposes of brevity.

Furthermore, Applicant respectfully requests that Mine does not teach, describe or suggest “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation.” Applicant understands Mine to disclose a transcoding method and transcoding apparatus. Applicant respectfully requests that Mine is silent as to “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation,” and moreover is not relied upon as providing such a teaching.

Applicant respectfully asserts that the combination of Seo, Triantafyllidis, Sorial and Mine does not support a *prima facie* case of obviousness and does not teach, disclose or suggest the claimed embodiments of the present invention as recited in Claims 1 and 9, that these claims overcome the rejection under 35 U.S.C. § 103(a), and that these claims are thus in a condition for allowance. Applicant respectfully requests that the combination of Seo, Triantafyllidis, Sorial and Mine also does not teach or suggest the additional claimed features of the present invention as recited in Claims 7 that depend from Claim 1 and Claim 13 that depends from Claim 9. Therefore, Applicant respectfully requests that Claims 7 and 13 also overcome the rejection under 35 U.S.C. § 103(a), and are in a condition for allowance as being dependent on an allowable base claim.

35 U.S.C. §103(a) – Claim 8

The instant Office Action states that Claim 8 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Seo in view of Triantafyllidis, further in view of U.S. Patent No. 6,587,508 by Hanamura et al., hereinafter referred to as “Hanamura.” Applicant has reviewed Seo, Triantafyllidis and Hanamura and respectfully submits that the claimed embodiments as recited in Claim 8 is patentable over the combination of Seo, Triantafyllidis and Hanamura for at least the following rationale.

Claim 8 is dependent on independent Claim 1 and includes the recitations of Claim 1. Hence, by demonstrating that Seo, Triantafyllidis and Hanamura do not show or suggest the limitations of Claim 1, it is also demonstrated that Seo, Triantafyllidis and Hanamura do not show or suggest the embodiments of Claim 8.

As presented above, Applicant respectfully requests that the combination of Seo and Triantafyllidis does not teach, describe or suggest “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation” as claimed. The Examiner is respectfully directed to the argument accompanying the discussion of the rejection of Claims 1-5 and 9-11 above to support this assertion; the argument is not duplicated here for purposes of brevity.

Furthermore, Applicant respectfully requests that Hanamura does not teach, describe or suggest “selectively performing a deblocking operation on said coefficient to generate a second coefficient, wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation.” Applicant understands Hanamura to disclose an apparatus for transcoding a coded moving picture sequence. Applicant respectfully requests that Hanamura is silent as to “selectively performing a deblocking operation on said coefficient to generate a second coefficient,

wherein said deblocking operation is performed on said coefficient if it is determined that said coefficient is responsive to said deblocking operation,” and moreover is not relied upon as providing such a teaching.

Applicant respectfully asserts that the combination of Seo, Triantafyllidis and Hanamura does not support a *prima facie* case of obviousness and does not teach, disclose or suggest the claimed embodiments of the present invention as recited in Claim 1, that this claim overcomes the rejection under 35 U.S.C. § 103(a), and that this claim is thus in a condition for allowance. Applicant respectfully requests that the combination of Seo, Triantafyllidis and Hanamura also does not teach or suggest the additional claimed features of the present invention as recited in Claim 8 that depends from independent Claim 1. Therefore, Applicant respectfully requests that Claim 8 also overcome the rejection under 35 U.S.C. § 103(a), and is in a condition for allowance as being dependent on an allowable base claim.

35 U.S.C. §103(a) – Claims 19 and 21-23

The instant Office Action states that Claims 19 and 21-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Sorial in view of Mine. Applicant has reviewed Sorial and Mine and respectfully submits that the claimed embodiments as recited in Claims 19 and 21-23 are patentable over the combination of Sorial and Mine for at least the following rationale.

Claim 19 is dependent on independent Claim 14 and includes the recitations of Claim 14. Hence, by demonstrating that Sorial and Mine do not show or suggest the limitations of Claim 14, it is also demonstrated that Sorial and Mine do not show or suggest the embodiments of Claim 19.

As presented above, Applicant respectfully requests that Sorial does not teach, describe or suggest “determining whether said first coefficient is responsive to a deblocking operation based on said quantization operation” as recited in Claim 14. The Examiner is respectfully directed to the argument accompanying the discussion of the rejection of Claims 14-16, 18 and 20 above to support this assertion; the argument is not duplicated here for purposes of brevity. Moreover, Applicant respectfully submits that Sorial also does not teach, describe or suggest the similar embodiment of Claim 21.

Furthermore, Applicant respectfully requests that Mino does not teach, describe or suggest “determining whether said first coefficient is responsive to a deblocking operation based on said quantization operation” as claimed. Applicant understands Mine to disclose a transcoding method and transcoding apparatus. Applicant respectfully requests that Mine is silent as to “determining whether said first coefficient is responsive to a deblocking operation based on said quantization operation,” and moreover is not relied upon as providing such a teaching.

Applicant respectfully asserts that the combination of Sorial and Mine does not support a *prima facie* case of obviousness and does not teach, disclose or suggest the claimed embodiments of the present invention as recited in independent Claims 14 and 21, that these claims overcome the rejection under 35 U.S.C. § 103(a), and that these claims are thus in a condition for allowance. Applicant respectfully requests that the combination of Seo and Mine also does not teach or suggest the additional claimed features of the present invention as recited in Claims 19 that depend from independent Claim 14 and Claims 22 and 23 that depend from independent Claim 21. Therefore, Applicant respectfully requests that Claims 19, 22 and 23 also overcome the rejection under 35 U.S.C. § 103(a), and are in a condition for allowance as being dependent on an allowable base claim.

### CONCLUSION

Based on the arguments presented above, Applicant respectfully asserts that Claims 1-11, 13-16 and 18-26 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these Claims.

Respectfully submitted,

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